

ZACHARY W. CARTER Corporation Counsel

THE CITY OF NEW YORK LAW DEPARTMENT 100 CHURCH STREET NEW YORK, NY 10007

STEPHANIE M. VILELLA ALONSO

Assistant Corporation Counsel Phone: (212) 356-2318 Fax: (212) 356-3509 svilella@law.nyc.gov

May 14, 2019

VIA ECF

Honorable Vernon S. Broderick United States District Judge United States District Court Southern District of New York 40 Foley Square, Room 415 New York, New York 10007

Re: Tyreik Williams v. City of New York, et al., 18-CV-5175 (VSB)

Your Honor:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, representing defendants City of New York, Commissioner Cynthia Brann, and Bureau Chief Yolanda Canty in the above-referenced matter. Defendants write respectfully in response to the Court's May 3, 2019 Order.

By way of background, plaintiff alleges, *inter alia*, that he was arrested on April 18, 2018, and was subsequently incarcerated at West Facility from approximately April 24, 2018, until May 17, 2018. Plaintiff further claims that he was placed in punitive segregation in violation of a New York City Department of Correction (hereinafter "DOC") policy which outlawed punitive segregation for adolescents 21 years and younger.

At the May 3, 2019 Initial Pretrial Conference, Your Honor directed the parties to create a joint proposed case management plan. Yesterday, the parties conferred and created a case management plan. (See ECF No. 26) During the telephone call, plaintiff indicated that he intends to call his mental health providers at West Facility as expert witnesses. However, plaintiff also indicated that he is unsure as to the purpose of expert witnesses. In light of plaintiff's *pro se* status, the undersigned indicated that plaintiff shall direct any legal questions to the Pro Se Office. The parties also agreed that plaintiff shall write to defendants by May 20, 2019 confirming whether he intends to use his mental health providers as expert witnesses. The

undersigned will file an updated case management plan as soon as the undersigned receives a confirmation from plaintiff.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Stephanie Michelle Vilella Alonso Assistant Corporation Counsel

cc: **BY FIRST-CLASS MAIL**

Tyreik Williams
DIN #: 19-A-1691
Plaintiff Pro Se
Downstate Correctional Facility
P.O. Box F
Fishkill, New York 12524